

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

PARKER-HANNIFIN CORPORATION, and PARKER INTANGIBLES, LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C.A. No. 06-751-MPT
	:	
ZIPPERTUBING (JAPAN), LTD.,	:	
	:	
Defendant.	:	
<hr style="border: 0.5px solid black;"/>		
PARKER-HANNIFIN CORPORATION, and PARKER INTANGIBLES, LLC,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	C.A. No. 07-104-MPT
	:	
SEIREN CO., LTD.,	:	
	:	
Defendant.	:	
<hr style="border: 0.5px solid black;"/>		

**DECLARATION OF WILLIAM I. FLANDERS IN SUPPORT OF  
PLAINTIFFS' OPENING CLAIM CONSTRUCTION BRIEF**

I, William I. Flanders, hereby declare and state as follows:

1. I am the Division Marketing Manager - Americas for the Chomerics Division of Parker-Hannifin Corporation. I received a B.S. in Interdisciplinary Engineering from Clarkson University in 1976. I have eighteen (18) years of experience in the electromagnetic interference ("EMI") shielding industry. I have nine (9) years of experience with design and manufacture of foam-based EMI shielding gaskets.

2. I am a coinventor of the subject matter described and claimed in U.S. Patent No. 6,248,393, U.S. Patent No. 6,387, 523, U.S. Patent No. 6,521,348, U.S. Patent No. 6,716,536, and U.S. Patent No. 6,777,095 (collectively "the patents-in-suit").

3. I am familiar with the testing and certification procedures employed by Underwriters Laboratories ("UL").

4. In my opinion, a foam component, such as the foam core of a gasket, could be submitted to UL for flammability testing under UL Standard No. 94. It is my further opinion that the foam core would be eligible for a V-0 rating provided that it meets the requirements set forth in Standard No. 94. This is true today as it was in 1999 when the application for U.S. Pat. No. 6,428,393 was filed.

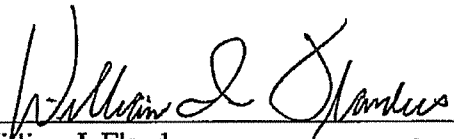
5. There are some commercially available foams, such as those sold by Rogers Corporation, for the construction of gaskets that carry a V-0 rating under Standard No. 94.

6. Submission of a foam core to UL for testing under Standard No. 94 is not necessary to carry out the inventions claimed in the patents-in-suit.

7. Common foamed polymeric materials are flammable and would not be accorded a V-0 rating if submitted for testing under UL Standard No. 94 unless specifically loaded with flame retardant additives.

8. In my opinion, there would be no motivation for one of ordinary skill in the art to submit common foamed polymeric materials to UL for testing under Standard No. 94, because one of ordinary skill would know that such materials would not be accorded a V-0 rating unless specifically modified for flame retardancy.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. This Declaration is executed this 1st day of July, 2008.

  
\_\_\_\_\_  
William I. Flanders

**CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to counsel of record on the Court's CM/ECF registrants for this case. I further certify that on July 1, 2008, I caused a copy of the foregoing document to be served upon the following in the manner indicated:

**BY E-MAIL AND HAND DELIVERY**

William J. Marsden, Jr.  
FISH & RICHARDSON P.C.  
919 N. Market Street, Suite 1100  
P.O. Box 1114  
Wilmington, DE 19899-1114  
marsden@fr.com

**BY E-MAIL**

John P. Pegram  
Michael T. Zoppo  
FISH & RICHARDSON P.C.  
Citigroup Center  
153 East 53<sup>rd</sup> Street, 52<sup>nd</sup> Floor  
New York, NY 10022-4611  
peggram@fr.com  
zoppo@fr.com

/s/ Francis DiGiovanni

Francis DiGiovanni (#3189)